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13 UNITED STATES DISTRICT COURT
14 NORTHERN DISTRICT OF CALIFORNIA

15 IN RE TEZOS SECURITIES LITIGATION

Master File No. 17-cv-06779-RS

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17 This document relates to:

18 ALL ACTIONS.
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CLASS ACTION

**JOINT STIPULATION AND
[PROPOSED] ORDER EXTENDING
TIME TO RESPOND TO THE
CONSOLIDATED COMPLAINT AND
PROVIDE INITIAL DISCLOSURES**

1 Pursuant to Local Rules 6-2 and 7-12, defendants Tezos Stiftung (the “Foundation”),
2 Dynamic Ledger Solutions, Inc. (“DLS”), Kathleen Breitman and Arthur Breitman (the
3 “Breitmans”) (collectively with the Foundation and DLS, the “Foundation and DLS
4 Defendants”), Timothy Draper and Draper Associates V Crypto LLC (the “Draper Defendants”)
5 and plaintiff Arman Anvari (“Lead Plaintiff”) (together with the defendants, the “parties”),
6 through their counsel, submit the following Joint Stipulation and [Proposed] Order Extending
7 Time to Respond to the Consolidated Complaint and Provide Initial Disclosures.

8 WHEREAS, on April 3, 2018, Lead Plaintiff filed a Consolidated Complaint (Dkt.
9 No. 108);

10 WHEREAS, on May 15, 2018, the Foundation and DLS Defendants and the Draper
11 Defendants filed motions to dismiss the Consolidated Complaint (Dkt. Nos. 119, 123);

12 WHEREAS, on August 7, 2018 the Court denied the Foundation and DLS Defendants’
13 motions and granted the Draper Defendants’ motion with leave to amend (Dkt. No. 148);

14 WHEREAS, Lead Plaintiff does not intend to amend the Consolidated Complaint in
15 response to the Court’s August 7, 2018 Order (Dkt. 148) and hereby gives notice to the Court of
16 his election not to amend;

17 WHEREAS, pursuant to Federal Rule of Civil Procedure 12(a)(4)(A), the Foundation and
18 DLS Defendants’ current deadline to respond to the Consolidated Complaint is August 21, 2018;

19 WHEREAS, pursuant to Federal Rule of Civil Procedure 26(a)(1), the current deadline
20 for the parties to serve initial disclosures is August 29, 2018;

21 WHEREAS, the Foundation and DLS Defendants have requested to extend their deadline
22 to answer the Consolidated Complaint to September 14, 2018, a request to which Lead Plaintiff
23 has consented;

24 WHEREAS, Lead Plaintiff and the Foundation and DLS Defendants wish to extend the
25 deadline to serve initial disclosures to coincide with the Foundation and DLS Defendants’
26 deadline to answer the Consolidated Complaint; and

27 WHEREAS, in order to accommodate consolidation of multiple pending actions, the
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1 appointment of a lead plaintiff, and resolution of defendants' motions to dismiss, defendants'
2 time to respond to the complaint has previously been extended twice, and the deadline for initial
3 disclosures has previously been continued three times;

4 IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of
5 the parties, as follows:

6 (a) The Foundation and DLS Defendants shall answer the Consolidated Complaint on
7 or before September 14, 2018; and

8 (b) Lead Plaintiff and the Foundation and DLS Defendants shall serve initial
9 disclosures pursuant to Federal Rule of Civil Procedure 26(a)(1) on or before September 14,
10 2018.

11 Stipulated and agreed to by:
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1 Date: August 16, 2018

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FILER'S ATTESTATION

Pursuant to Civil L. R. 5-1(i)(3), regarding signatures, I hereby attest that concurrence in the filing of the document has been obtained from all of the signatories above.

Dated: August 16, 2018

/s/ Neal A. Potischman

Neal A. Potischman

* * *

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: _____

HONORABLE RICHARD SEEBORG
U.S. DISTRICT JUDGE